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Federal National Mortgage Association*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

James and Katherine McCalmont, married individuals,

No. 2:13-cv-02107-JJT

Plaintiff,

V.

Federal National Mortgage Association and Federal Housing Finance Agency as the conservator of Federal National Mortgage Association,

**REPLY IN SUPPORT OF FEDERAL
NATIONAL MORTGAGE
ASSOCIATION'S *DAUBERT*
MOTION TO EXCLUDE EVAN D.
HENDRICKS**

Defendants.

1 **I. INTRODUCTION**

2 Plaintiffs devote most of their opposition to Fannie Mae’s *Daubert* motion to
 3 describing Mr. Hendricks’s professional experience. To be sure, Mr. Hendricks has
 4 self-published a newsletter and book, and works as a paid witness. But no résumé is
 5 sufficient to admit legal opinions or speculation devoid of reliable methodology. *See*
 6 *United States v. Hermanek*, 289 F.3d 1076, 1093 (9th Cir. 2002) (“It is well settled that
 7 bare qualifications alone cannot establish the admissibility of . . . expert testimony.”);
 8 *Suenos, LLC v. Goldman*, No. CV10-1034-TL, 2013 WL 11312587, at *1 (D. Ariz. Jan.
 9 24, 2013) (Experts “relying solely or primarily on experience . . . must explain how that
 10 experience leads to the conclusion reached, why that experience is a sufficient basis for
 11 the opinion, and how that experience is reliably applied to the facts.”) (citing Fed. R. Civ.
 12 P. 702, advisory committee notes to 2000 amendments).

13 No matter how extensive Mr. Hendricks’s self-publishing and testifying experience
 14 may be, his opinions in this case are not admissible and should be excluded. First, the
 15 bulk of Mr. Hendricks’s proffered opinions are legal argument and conclusions, which the
 16 parties agree are inadmissible. Plaintiffs claim that Fannie Mae’s motion mischaracterizes
 17 Mr. Hendricks’s opinions in this regard, but the face of Mr. Hendricks’s report contradicts
 18 their arguments. Second, Mr. Hendricks’s purported expertise is insufficient to support
 19 the opinions he seeks to present. For example, he has no first-hand industry or other
 20 professional experience on which to base his opinions regarding how lenders use DU
 21 Findings or how lenders report derogatory mortgage events to credit reporting agencies.
 22 He instead relies on his general impressions and second-hand accounts. Finally, Mr.
 23 Hendricks attempts to recast the language of the Fair Credit Reporting Act into
 24 speculative “industry standards.” Yet Mr. Hendricks is manifestly unable to explain or
 25 support any such standards.

26 The Hendricks Report does not meet the requirements of Rule of Evidence 702 that
 27 expert opinions must be “a product of reliable principles” and “reliably appl[y] the
 28 principles . . . to the facts of the case.” Fed. R. Evid. 702(c), (d). The legal conclusions

1 and flaws in Mr. Hendricks's hazy methodology are not just "weight-of-the-evidence"
 2 issues; they render his opinions excludable under *Daubert* and Federal Rule of Evidence
 3 702. Fannie Mae respectfully requests that the Court exclude Mr. Hendricks's opinions.

4 **II. ARGUMENT**

5 **A. Mr. Hendricks's Legal Opinions On The FCRA's Meaning And**
6 Application Should Be Excluded.

7 Plaintiffs do not substantively respond to Fannie Mae's detailed showing that
 8 Mr. Hendricks's opinions are rife with legal conclusions. (*See* ECF No. 116 ("Hendricks
 9 Mot.") at 4-5; ECF No. 128 ("Opp.") at 4.) Indeed, Plaintiffs "whole-heartedly agree such
 10 ultimate legal conclusions are not for Mr. Hendricks to instruct the jury." (Opp. at 4.)
 11 Yet Plaintiffs simply ignore the numerous legal opinions in Mr. Hendricks's Report.

12 As described in Fannie Mae's motion (Hendricks Mot. at 5), and despite Plaintiffs'
 13 assurances (Opp. at 3-4), Mr. Hendricks spends nearly half of his report attempting to
 14 establish that DU findings constitute "consumer reports" under the FCRA, concluding that
 15 "***DU Findings Reports are indeed consumer reports***" and "***Fannie Mae acts as a***
 16 ***consumer reporting agency*** when it sells such reports." (ECF No. 116-2 ("Hendricks
 17 Report") at 5 (emphasis added).) In the preceding five pages, Mr. Hendricks attempts to
 18 dissect and apply various statutory definitions, and opines at length on the meaning of
 19 "adverse action" under the FCRA and Equal Credit Opportunity Act. (*Id.* at 2-3.) The
 20 remainder of these sections are concerned with whether DU findings "bear on" "credit
 21 capacity and mode of living" or "creditworthiness," which are central elements of the
 22 FCRA's definition of a "consumer report." (*See id.* at 1-5); 15 U.S.C. § 1681a.

23 These are impermissible legal conclusions, and they should be excluded. *See G.F.*
 24 *Co. v. Pan Ocean Shipping Co.*, 23 F.3d 1498, 1507 n.6 (9th Cir. 1994) ("We have
 25 'condemned the practice of attempting to introduce law as evidence'"') (citation omitted);
 26 *Aguilar v. Int'l Longshoremen's Union Local #10*, 966 F.2d 443, 447 (9th Cir. 1992)
 27 ("matters of law [are] for the court's determination" and are "inappropriate subjects for
 28 expert testimony"); *Nationwide Transp. Fin. v. Cass Info. Sys.*, 523 F.3d 1051, 1058 (9th

1 Cir. 2008) (“[A]n expert witness cannot give an opinion as to her *legal conclusion*, i.e., an
 2 opinion on an ultimate issue of law.”); *United States v. Boulware*, 558 F.3d 971, 975 (9th
 3 Cir. 2009) (affirming exclusion of expert testimony that “constituted a legal opinion”)
 4 (citation omitted).

5 **B. Mr. Hendricks’s Opinions That Fannie Mae Acted “Unreasonably” Or
 Caused Plaintiffs’ Losses Are Inadmissible.**

6 **1. Mr. Hendricks’s Opinions On Whether Fannie Mae’s Conduct
 Comports With The FCRA Are Impermissible Legal
 Conclusions.**

7 As explained in Fannie Mae’s Motion, Mr. Hendricks’s legal opinions go further,
 8 opining on the central issue in this case—how the FCRA applies to the facts regarding
 9 Fannie Mae’s alleged actions in this case. (*See* Hendricks Mot. at 6.) Plaintiffs do not
 10 respond to this argument beyond making the bald assertion that Fannie Mae
 11 “mischaracterizes and then recasts all [of] Mr. Hendricks’ anticipated testimony as solely
 12 legal conclusions.” (Opp. at 3.)

13 Again, Plaintiffs simply ignore the Hendricks Report. For example, Mr.
 14 Hendricks’s own “Methodology” section states that “a fundamental method that I employ
 15 and follow is to apply my experience with and specialized knowledge of . . . the ***Fair***
 16 ***Credit Reporting Act and operations thereunder, to the facts at hand.***” (Hendricks
 17 Report at 5 (emphasis added).) Mr. Hendricks goes on: “Another important purpose [of
 18 his proposed testimony] is to . . . help the jury determine if the Defendant’s problematic
 19 actions in relation to Plaintiffs was foreseeable [*sic*] . . . still another purpose is to help
 20 the jury evaluate whether Plaintiffs’ damages were foreseeable.” (*Id.*) Similarly, Mr.
 21 Hendricks seeks to inform the jury that Fannie Mae’s purported evaluation of the
 22 short-sale information was “unreasonable.” (*Id.* at 7.) Further, he opines, “[i]n Plaintiffs’
 23 case, the ‘adverse impact’ on Fannie’s ‘recommendation’ *directly resulted* in the ‘adverse
 24 action’ of the Plaintiffs being denied mortgage loans by Amerifirst Financial and
 25 Homeowners Financial Group (and possibly others).” (*Id.* at 3 (emphasis added).)

1 These are all legal conclusions and are therefore inappropriate subjects of expert
 2 opinion. *See United States v. Scholl*, 166 F.3d 964, 973 (9th Cir. 1999); *see also Miller v.*
 3 *Stryker Instruments*, No. CV 09-813-PHX-SRB, 2012 U.S. Dist. LEXIS 70314, at *33
 4 (D. Ariz. Mar. 29, 2012) (excluding testimony and holding that “[r]egarding whether
 5 Defendant deviated from legal requirements . . . , it is the responsibility of the Court to
 6 instruct the jury about those legal requirements”). Indeed, Judge Bolton excluded
 7 Mr. Hendricks from “provid[ing] an opinion as to whether [Fannie Mae’s] procedures
 8 should be considered ‘unreasonable’ under the FCRA, because this is an ultimate issue
 9 that will be decided by the jury.” *Zabriskie v. Fed. Nat'l Mortg. Ass'n*, No.
 10 CV-13-02260-PHX-SRB, 2016 WL 3653512, at *2 (D. Ariz. Apr. 22, 2016). Mr.
 11 Hendricks should be barred from offering such opinions, just as he has been in the past.

12 **2. Mr. Hendricks's Methodology Is Unreliable.**

13 Plaintiffs do not dispute that Mr. Hendricks's knowledge of credit reporting is
 14 based on his prior work as an expert witness and his review of deposition transcripts. (*See*
 15 Hendricks Mot. at 8-9; Opp. at 16-17.) Plaintiffs cite no authority for the proposition that
 16 such limited and second-hand experience, gained in the adversarial context of litigation,
 17 qualifies one as an expert. While Mr. Hendricks did author a newsletter on privacy
 18 matters and a book on credit reports for consumers, both of these were self-published.
 19 (Opp. at 6.) Plaintiffs offer no evidence that the information or views expressed in these
 20 works have ever been independently verified, acknowledged as accurate by industry
 21 members, or subject to any form of peer review. *See Daubert v. Merrell Dow Pharmas., Inc.*,
 22 509 U.S. 579, 593 (1993) (peer review is a “pertinent consideration” for
 23 admissibility). And as Plaintiffs recently argued, prior expert testifying experience does
 24 not amount to “specialized knowledge” of a topic. (ECF No. 123 at 7-8 (citing *Thomas J. Kline, Inc. v. Lorillard, Inc.*, 878 F.2d 791, 800 (4th Cir. 1989) (“it would be absurd to
 25 conclude that one can become an expert simply by accumulating experience in
 26 testifying”); *Neal v. CSC Credit Card Servs., Inc.*, No. 8:02CV378, 2004 WL 628212, at
 27 *1 (D. Neb. Mar. 30, 2004) (excluding expert witness because his “alleged expertise
 28

1 comes directly from his preparations for this and other [FCRA] litigation, not from
 2 education or work experience”)).)

3 Altogether, Mr. Hendricks’s purported expertise is insufficient to admit his
 4 proposed opinions in this case. *See Hermanek*, 289 F.3d at 1093-94; *Lucido v. Nestle*
 5 *Purina Petcare Co.*, 217 F. Supp. 3d 1098, 1107 (N.D. Cal. 2016) (excluding expert
 6 testimony in its entirety where the qualifications of the proposed expert were not relevant
 7 to the specific opinions offered).

8 **3. Mr. Hendricks’s Opinions Regarding Industry Standards Are
 9 Not Based On Sufficient Data.**

10 As discussed in Fannie Mae’s Motion, Mr. Hendricks does not explain the
 11 “well-known and long-standing standards” discussed in his Report, and admitted that the
 12 reference guide mentioned in his Report is voluntary and does not apply to Fannie Mae.
 13 (*See* Hendricks Mot. at 10-12.) Plaintiffs attempt to portray this as a mere failure to
 14 include “pin citations” to industry materials generally referenced by Mr. Hendricks.
 15 (Opp. at 16.) But a review of Mr. Hendricks’s Report reveals that he never provides any
 16 explanation of these “industry standards.”

17 Specifically, Mr. Hendricks writes that “[a]ccuracy is . . . a leading standard in the
 18 internal manuals of the participants in the credit reporting industry.” (Hendricks Report at
 19 6.) However, Mr. Hendricks does not attempt to explain any specific standard by which
 20 accuracy is to be judged in this case or how it is implemented in the credit reporting
 21 industry. Nor has he produced any such internal manuals in this case. Similarly, Mr.
 22 Hendricks states that “[a]nother important standard in credit reporting coinciding with
 23 accuracy is completeness.” (*Id.*) Yet Mr. Hendricks does not attempt to articulate any
 24 specific standard for completeness in the context of credit reporting. As explained in
 25 Fannie Mae’s Motion, Mr. Hendricks’s failure to identify specific standards for
 26 determining accuracy or completeness makes his opinions simply speculation. For
 27 example, Mr. Hendricks does not provide *any sources* or *any basis* to support his claim

1 that information in a tradeline can be both technically accurate and misleading. (See
 2 Hendricks Mot. at 10-11.)

3 Mr. Hendricks's opinions pertaining to industry standards, as disclosed in his
 4 Report, amount to mere speculation and only serve to cloud the issues in this case. These
 5 opinions should be excluded. *See Ollier v. Sweetwater Union High Sch. Dist.*, 768 F.3d
 6 843, 860 (9th Cir. 2014) (affirming exclusion of expert opinions where the district court
 7 could not "discern what, if any, method he employed in arriving at his opinions" and
 8 found that the expert's "conclusions appear to be based on his personal opinions and
 9 speculation rather than on a systematic assessment"); *McGlinchy v. Shell Chem. Co.*, 845
 10 F.2d 802, 806-07 (9th Cir. 1988) (affirming exclusion of expert report that "rests on
 11 unsupported assumptions and ignores distinctions crucial to arriving at a valid
 12 conclusion"); *Grodzitsky v. Am. Honda Motor Co.*, No. 2:12-CV-1142-SVW-PLA, 2015
 13 WL 2208184, at *8 (C.D. Cal. Apr. 22, 2015) (excluding opinions when an expert witness
 14 failed to identify the relevant industry standards); *see Wright v. GMAC*, 545 F. App'x 686,
 15 688 (9th Cir. 2013) (concluding that Mr. Hendricks's "vague and abstract expert
 16 testimony" was unavailing to establish causation).

17 In addition, Fannie Mae has shown that Mr. Hendrick's use of the term "industry
 18 standards" amounts to simply applying the standards set forth in the FCRA. (See
 19 Hendricks Mot. at 7 n.1, 10-11.) Plaintiffs do not respond to this point. As discussed
 20 above, Mr. Hendricks may not opine on whether Fannie Mae's conduct comports with
 21 FCRA standards because this would be an impermissible legal conclusion.

22 Finally, Mr. Hendricks's opinions would confuse the line between statutory and
 23 industry standards and are unduly prejudicial. (See Hendricks Mot. at 13); *see also United*
 24 *States v. Pac. Gas & Elec. Co.*, No. 14-cr-00175-TEH, 2016 WL 1640462, at *3 (N.D.
 25 Cal. Apr. 26, 2016) (excluding opinions on industry standards that "would confuse the
 26 issues" because it would invite the jury to substitute another standard for the statutory
 27 standard that the plaintiff must prove); *Equal Employment Opportunity Comm'n v. Glob.*
 28 *Horizons, Inc.*, No. CV-11-3045-EFS, 2014 WL 11429301, at *2–3 (E.D. Wash. May 9,

1 2014) (prohibiting expert testimony on industry standards because it “could unduly
 2 prejudice the jury by allowing the jury to consider the [defendants] as bad actors for
 3 simply failing to comply with industry. . . policies”). Again, Plaintiffs do not respond to
 4 this argument. Mr. Hendricks’s opinions on “industry standards” should be excluded for
 5 this additional reason.

6 **C. Mr. Hendricks Should Not Be Permitted To Testify On Intent Or State
 7 Of Mind, Or To Parrot Other Factual Allegations In Lieu Of Direct
 Proof.**

8 Fannie Mae has also made a detailed showing that Mr. Hendricks seeks to testify
 9 about the intent and states of mind of lenders and Fannie Mae, and to present factual
 10 allegations that require direct proof by Plaintiffs. (Hendricks Mot. at 12-13.)

11 In response, Plaintiffs assert that “Mr. Hendricks also does not intend to offer
 12 testimony as to Fannie Mae’s ‘state of mind’ as Fannie Mae contends.” (Opp. at 4.)
 13 Again, Mr. Hendricks’s written opinions contradict these reassurances. Mr. Hendricks
 14 opines that Fannie Mae had “specific knowledge” of standards set forth in the FCRA and
 15 “chose to disregard” various notices. (Hendricks Report at 9-10.) It would be improper
 16 for the Plaintiffs to use Mr. Hendricks to present these opinions, for the exact reasons
 17 described in Fannie Mae’s Motion and *Valenzuela v. Equifax Information Services LLC*,
 18 No. CV-13-02259-PHX-DLR, 2015 U.S. Dist. LEXIS 151064 (D. Ariz. Nov. 6, 2015),
 19 which held:

20 Hendricks’ testimony about [defendant’s] motivations, intentions, objective state
 21 of mind, and subjective beliefs is improper because it usurps the province of the
 22 fact-finder, which is responsible for drawing reasonable inferences about
 23 [defendant’s] state of mind from the evidence presented at trial. Hendricks’
 opinion will not assist the fact-finder in drawing these inferences. He will not be
 permitted to opine on these subjects.

24 *Id.* at *8-9.

25 For the same reasons, Mr. Hendricks should not be permitted to offer opinions
 26 about lenders’ beliefs, state of mind, and intent, as well as statements about alleged events

1 post-dating the relevant time period. (*See* Hendricks Mot. at 12-13.) These opinions
2 should be excluded.

3 **D. Plaintiffs' Proposed Additional Opinions Should Also Be Excluded.**

4 In their Opposition, Plaintiffs seek to impermissibly expand Mr. Hendricks's
5 opinions beyond the scope of his Report. In their list of proposed topics, Plaintiffs state
6 that the opinions will include "identification of the consumer credit industry players
7 (credit furnishers, credit reporting agencies, tri-merge companies, mortgage
8 brokers/lenders, and Fannie Mae) and credit scoring data that were involved in the
9 McCalmonts' mortgage loan application process." (Opp. at 3.) Plaintiffs also state the
10 opinions will include "the extent to which other consumer reporting agencies in the
11 consumer reporting industry maintain policies and procedures to report accurate consumer
12 information to lenders in consumer loan transactions." (*Id.*) These topics are not
13 discussed anywhere in the Hendricks Report. This violates the requirement that an expert
14 report contain "a complete statement of all opinions the witness will express." Fed. R.
15 Civ. P. 26(a)(2)(B)(i). Nor were they disclosed at deposition. These proposed new
16 opinions should also be excluded.

17 **III. CONCLUSION**

18 For each of the reasons set forth above and in Fannie Mae's Motion, Fannie Mae
19 respectfully requests that the Court exclude the opinions of Evan D. Hendricks in its
20 entirety.

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1 DATED this 11th day of May, 2018
2

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5 By: /s/ Erica Stutman
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on May 11, 2018, I electronically transmitted the foregoing
3 document to the Clerk's Office using the CM/ECF System for filing and transmittal of a
4 Notice of Electronic Filing to the following CM/ECF registrants:

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